

### III. REMARKS

Claims 1-22 are pending in this application. By this amendment, claims 1, 6, 11, 14, 15 and 18 have been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-5 and 11-22 are rejected under 35 U.S.C. §103(a) as allegedly being anticipated by Goldberg *et al.* (U.S. Patent No. 6,496,833), hereafter “Goldberg,” in view of Pepin (U.S. Patent No. 6,948, 150), hereafter “Pepin,” and further in view of Radigan (U.S. Patent No. 6,738,967), hereafter “Radigan,” and further in view of Brassard (U.S. Patent No. 6,742,175), hereafter “Brassard.” Claim 6 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Goldberg in view of Pepin in view of Radigan. Claims 7-10 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Goldberg in view of Pepin and further in view of Radigan and further in view of Brassard. Applicants respectfully traverse this rejection for the following reasons.

With regard to the 35 U.S.C. §103(a) rejection over Goldberg in view of Pepin, Applicants assert that the cited references do not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 6, 11, 14, 15 and 18, Applicants respectfully submit that the cited references fail to disclose that, *inter alia*, that each physical code generator generates physical code corresponding to one of a plurality of performed operations in an application. Instead, the aspects of the cited references that the Office equate with the physical code generators of the claimed invention process entire applications and do not independently process separate portions of a common application. Accordingly, withdrawal of the above-cited rejections is requested.

With further respect to independent claim 1, and similarly claimed in independent claims 11 and 14, Applicants respectfully submit that the cited references fail to teach or suggest that the application that is produced by the physical code generators is adapted for a particular target environment. In contrast, the elements of the references cited by the Office that the Office equates with the physical code generators of the claimed invention each correspond to different environments. For example, one code module may be used to produce an entire application in a Java environment while another is used to produce an entire application in a Linux environment. To this extent, none of the references cited by the Office teaches or suggests a framework that links multiple independent code generators that each process one of a plurality of performed operations to form a single application in a single environment. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 11, 14 and 15, and with respect to dependent claim 7, Applicants respectfully submit that the cited references also fail to teach that,

*inter alia*, "...said generator dictionary is adapted to be amended by the user to remove at least one code generator and replace the at least one code generator with a replacement code generator," as recited in claim 1 and claimed similarly in claims 7, 14 and 15. The Office cites an example in Pepin as teaching or suggesting this feature. Final Office Action, page 3. However, in the example of Pepin only the designer associated with the component is changed and not other aspects of the component, such as the associated code generator. Col. 5, line 48 through col. 6, line 18; FIGS. 2-3. Further, Pepin specifically teaches that modifications to components are done by the component supplier and not by the user. Accordingly, none of the references cited by the Office teaches or suggests that a code generator is removed from the framework and replaced with a replacement code generator by a user. Accordingly, Applicants request that the rejection be withdrawn.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

Finally, with regard to the rejection as a whole, Applicants note that the Office's rejection of independent claim 1 seeks to combine four different references to support its obviousness rejection. To this extent, Applicants submit that it is unfathomable how the Office can maintain its contention that there is motivation or suggestion in the references themselves or elsewhere to combine such diverse references. This is further accentuated by the fact that each of the

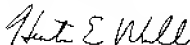
references performs a vastly different task. For example, the Office attempts to combine a monolithic query object generator (Goldberg) with a set of compilers having no framework at all (Radigan), a design time architecture that uses components in its design (Pepin), and a single code generator for generating component based code (Brassard). Accordingly, Applicants submit that the combinations that underlie the Office's rejections are flawed.

#### **IV. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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